

In the Matter of )  
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Universal Service Contribution Methodology ) WC Docket No. 06-122

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these reply comments in response to the Federal Communications Commission Public Notices requesting comment on a Petition filed by the Rural Independence Competitive Alliance and a request for Guidance filed by the Universal Service Administrative Company.<sup>1</sup>

As stated in earlier comments,<sup>2</sup> NATOA agrees with the Commission’s stance that the Universal Service Fund (“USF”) and Intercarrier Compensation (“ICC”) programs need reform. As part of that reform, NATOA supports the position taken by Public Knowledge and the National Hispanic Media Coalition that the Commission clarify that text messaging is a Title II service, subject to USF contributions.

As technology evolves, so, too, must the Fund. According to the CTIA, more than 1.5 trillion text messages were sent in 2009. Excluding text messages from the USF would

<sup>1</sup> NATOA's membership includes local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of such services for the nation's local governments.

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undermine the financial foundation of the Fund. By classifying text messaging under Title II, the Commission can not only provide the industry with regulatory certainty, but also help ensure the financial health of the USF. Taking this action, along with 1) including broadband as a supported service; 2) instituting steps to alleviate waste, fraud and abuse; and 3) permitting state, regional, and local networks to receive USF funding, will help ensure that advanced communications services are deployed in all areas of our country.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steve Traylor", with a stylized, cursive script.

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